

**REMARKS**

Applicants acknowledge receipt of the Final Office Action mailed September 7, 2006.

In the Final Office Action, the Examiner rejected claims 3 and 5 under 35 U.S.C. § 112, second paragraph; and rejected claims 1 and 4 under 35 U.S.C. § 103(a) as being unpatentable over *Morgavi* (U.S. Patent No. 6,562,413) in view of *Mills et al.* (U.S. Patent No. 7,073,901).

In this Amendment, Applicants propose to amend claims 1, 4, and 5, cancel claim 3, without prejudice or disclaimer, and add new claims 6 and 7. Upon entry of this Amendment, claims 1 and 4-7 will be pending. Of these claims, claim 1 is independent. Claim 2 was previously canceled, without prejudice or disclaimer, in the Amendment filed July 5, 2006.

The originally-filed specification, claims, abstract, and drawings fully support the amendments to claims 1, 4, and 5, and the addition of claims 6 and 7. No new matter has been introduced.

Based on the foregoing amendments and the arguments that follow, Applicants traverse the rejections above and respectfully request reconsideration for at least the reasons set forth below.

**I. 35 U.S.C. § 112, SECOND PARAGRAPH REJECTION**

Claims 3 and 5 stand rejected under 35 U.S.C. § 112, second paragraph. Applicants submit that the rejection of claims 3 and 5 has been rendered moot by the cancellation of claim 3 and the amendment to claim 5. Applicants therefore request that the rejection of claims 3 and 5 under 35 U.S.C. § 112, second paragraph be withdrawn.

## II. 35 U.S.C. § 103(a) REJECTION

Claims 1-4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Morgavi* in view of *Mills*. Applicants respectfully disagree with the Examiner's arguments and conclusions and submit that independent claim 1 is patentably distinguishable over *Morgavi* and *Mills* at least for the reasons set forth below. Applicants submit that the rejection of claims 2 and 3 has been rendered moot by the cancellation of those claims, without prejudice or disclaimer.

In order to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), each of three requirements must be met. First, the reference or references, taken alone or combined, must teach or suggest each and every element recited in the claims. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of the three requirements must "be found in the prior art, and not be based on applicant's disclosure." See M.P.E.P. §2143, 8th ed., February 2003.

*Morgavi* discloses a known technique for multicolor printing by inkjet in FIG. 2. The printing device includes "[s]everal reservoirs 21, 22, 23, and 24 containing...[a] black polymer ink and those of different colours[, which] feed at least one nozzle ejecting drops of ink...", and four ultraviolet lamps 25, 26, 27, and 28 for drying each ink individually (emphases added). (*Morgavi*, col. 1, ll. 54-55 and col. 2, ll. 1-4 and 20-22).

However, as admitted by the Examiner, *Morgavi*, at least, does not explicitly disclose "a first printing device, including a plurality of black printing heads...; a second

printing device, including a plurality of color printing heads[; and] wherein energy of the ultraviolet rays radiated from the second light radiating device is greater than energy of the ultraviolet rays radiated from the first light radiating device.” (*Final Office Action*, p. 4).

To cure the deficiencies of *Morgavi*, the Examiner relies on *Mills* and alleges that “Mills et al discloses...a plurality of black and colored printing heads lumped together in a single unit (figure 2A).” (*Id.* at p. 5, ll. 1-2).

*Mills* discloses a printing system 10 which includes a source that emits UV radiation to polymerize a fluid that is deposited onto a substrate by one or more print heads. The printing system 10 further includes a base 12, a rail system 16 attached to the base 12, and a carriage 18 coupled to the rail system 16. The carriage holds a series of inkjet print heads and one or more radiation sources, such as UV radiation sources. (*Mills*, Abstract and col. 5, ll. 4-9).

*Mills*, however, fails to disclose a first printing device including a plurality of printing heads for jetting a first set of image-setting ink drops and a second printing device including a plurality of printing heads for jetting a second set of image-setting ink drops (emphases added). Rather, as asserted by the Examiner, “a plurality of black and colored printing heads [are] lumped together in a single unit...” (emphases added). (*Final Office Action*, p. 5, ll. 1-2).

As disclosed in the present specification, two separate sets of ink groups are each individually cured by two individual UV ray sources, with each UV ray source radiating ultraviolet rays having a different energy. “When recording medium sheet 2 is conveyed to the position of printing head 13, black ink drops are jetted from printing

head 13, and immediately after that, the black ink drops are radiated by the light from first light radiation device 17, to be subjected to hardening. Subsequently, cyan ink drops are jetted from printing head 14, and the cyan ink drops are subjected to hardening by the radiation of light from second light radiation device 18...”

(*Specification*, p. 24, line 17 - p. 25, line 2).

Accordingly, with respect to independent claim 1, *Morgavi* and *Mills* fail to teach or suggest the claimed combination, including, *inter alia*:

“a first printing device including a plurality of first printing heads...for jetting a first set of image-setting ink drops...[and] a second printing device including a plurality of second printing heads for jetting a second set of image-setting ink drops[,]...the second printing device arranged downstream from the first printing device with respect to the conveyance direction...” (emphases added).

The Examiner has therefore not met at least one of the essential criteria for establishing a *prima facie* case of obviousness, wherein “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” See M.P.E.P. §§ 2142, 2143, and 2143.03. Accordingly, independent claim 1, and corresponding dependent claim 4, are patentable over *Morgavi* and *Mills*. Applicants therefore request that the rejection of claims 1-4 under 35 U.S.C. § 103(a) be withdrawn and claims 1 and 4 be allowed.

Claim 5 and new claims 6 and 7 depend from independent claim 1 and are allowable at least for the same reasons claim 1 is allowable. In addition, the dependent claims may recite unique combinations that are neither taught nor suggested by the cited art, and therefore is also separately patentable.

### **III. CONCLUSION**

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1 and 4-7 in condition for allowance.

Applicants submit that the proposed amendments of claims 1, 4, and 5 do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Furthermore, Applicants respectfully point out that the final action by the Examiner presented some new arguments as to the application of the art against Applicants' invention. It is respectfully submitted that the entering of the Amendment would allow the Applicants to reply to the final rejections and place the application in condition for allowance.

Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants submit that this claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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